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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF APPEAL AND STATEMENT OF
ELECTION TO HAVE APPEAL HEARD BY
DISTRICT COURT**

[Re: **Dkt. No. 12126**]

1 NOTICE IS HEREBY GIVEN that PG&E Corporation and Pacific Gas and Electric Company,
2 as debtors and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the
3 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020*,
4 the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases, hereby appeal, pursuant to **28**
5 **U.S.C. § 158(a)(1)**, from the *Order Granting DRRT’s Amended Motion For Relief From Orders*
6 *Concerning Reorganized Debtors’ Eleventh and Thirteenth Securities Claims Omnibus Objections*
7 *(Claims Barred by the Statute of Repose)*, entered on April 8, 2022 [**Dkt. No. 12126**] (as may be amended
8 or corrected,¹ the “**DRRT 60(b) Order**”). A copy of the DRRT 60(b) Order is attached hereto as
9 **Exhibit A**.

10 Pursuant to **28 U.S.C. § 158(c)**, the Reorganized Debtors elect to have the appeal heard by the
11 United States District Court for the Northern District of California rather than by the Bankruptcy
12 Appellate Panel for the Ninth Circuit.

13 The names of all parties to the DRRT 60(b) Order and the names, addresses, and telephone
14 numbers of their respective attorneys are:

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23 ¹ On April 19, 2022, at the request of and in cooperation with counsel for DRRT, the Reorganized
24 Debtors submitted to the Bankruptcy Court a proposed corrected form of the DRRT 60(b) Order (the
25 “**Corrected Order**”) to address a clerical error in the original DRRT 60(b) Order (specifically, to
26 include the Exhibit A that is referenced in, but was inadvertently omitted from, the original DRRT
27 60(b) Order). As of the time of this filing, the Bankruptcy Court has not yet entered the Corrected
28 Order. The Reorganized Debtors agreed to the Corrected Order as a matter of form and do not object to
the entry of the Corrected Order pursuant to Federal Rule of Civil Procedure Rule 60(a), as made
applicable to this matter by **Federal Rule of Bankruptcy Procedure 9024**, or otherwise even after the
filing of this Notice of Appeal. The Reorganized Debtors do not believe the entry of the Corrected
Order affects this appeal.

Party	Counsel
<p>Reorganized Debtors</p> <p><i>Appellants</i></p>	<p>WEIL, GOTSHAL & MANGES LLP Richard W. Slack (<i>pro hac vice</i>) (richard.slack@weil.com) Jessica Liou (<i>pro hac vice</i>) (jessica.liou@weil.com) Matthew Goren (<i>pro hac vice</i>) (matthew.goren@weil.com) 767 Fifth Avenue New York, NY 10153-0119 Tel: 212 310 8000 Fax: 212 310 8007</p> <p>KELLER BENVENUTTI KIM LLP Jane Kim (#298192) (jkim@kbkllp.com) David A. Taylor (#247433) (dtaylor@kbkllp.com) Thomas B. Rupp (#278041) (trupp@kbkllp.com) 650 California Street, Suite 1900 San Francisco, CA 94108 Tel: 415 496 6723 Fax: 650 636 9251</p>
<p>DRRT</p> <p><i>Appellee</i></p>	<p>DRRT Jared Lay (<i>pro hac vice</i>) 340 West Flagler Street, 2nd Floor Miami, Florida 33130 Telephone: (305) 760-8025 Facsimile: (786) 235-5005 Email: jlay@drdt.com</p> <p>MEYER LAW GROUP LLP A Limited Liability Partnership BRENT D. MEYER, Cal. Bar No. 266152 268 Bush Street #3639 San Francisco, California 94104 Telephone: (415) 765-1588 Facsimile: (415) 762-5277 Email: brent@meyerllp.com</p>

1 Dated: April 22, 2022

WEIL, GOTSHAL & MANGES LLP

KELLER BENVENUTTI KIM LLP

By: /s/ Richard W. Slack
Richard W. Slack

Attorneys for the Reorganized Debtors

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Exhibit A
(DRRT 60(b) Order)



Signed and Filed: April 7, 2022

DENNIS MONTALI
U.S. Bankruptcy Judge

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- ☐ Affects PG&E Corporation
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** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**ORDER GRANTING DRRT'S AMENDED
MOTION FOR RELIEF FROM ORDERS
CONCERNING REORGANIZED DEBTORS'
ELEVENTH AND THIRTEENTH
SECURITIES CLAIMS OMNIBUS
OBJECTIONS (CLAIMS BARRED BY THE
STATUTE OF REPOSE)**

[Re: Dkt. Nos. 11734, 11867, 11911, 12033]

Upon the *Amended Motion For Relief From Orders By Default Disallowing and Expunging Proofs of Claims Pursuant To Reorganized Debtors' Eleventh and Thirteenth Securities Claims Omnibus Objections (Claims Barred by the Statute of Repose)* [Dkt. No. 11734] (the “**Motion**”); and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24 (N.D. Cal.), and Bankruptcy Local Rule 5011-1(a); and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found and determined that notice of the Motion as provided to the parties listed therein is reasonable and sufficient under the circumstances, and it appearing that no other or further notice need be provided; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief sought; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted for the reasons stated on the record.
2. The *Order Disallowing and Expunging Proofs of Claim Pursuant to Reorganized Debtors' Eleventh Securities Claims Omnibus Objection (Claims Barred by the Statute of Repose)* [Dkt. No. 11216] and the *Order Disallowing and Expunging Proofs of Claim Pursuant to Reorganized Debtors' Thirteenth Securities Claims Omnibus Objection (Claims Barred by the Statute of Repose)* [Dkt. No. 11315] are hereby modified as to the proofs of claim filed by the DRRT Claimants (as set forth in the Motion), identified in Exhibit A hereto, to reinstate such proofs of claim insofar as they assert claims arising under Sections 10(b) and 20(a) of the Securities and Exchange Act of 1934, as amended, and Rule 10b-5 promulgated thereunder.
3. The *Reorganized Debtors' Eleventh Securities Claims Omnibus Objection (Claims Barred by the Statute of Repose)* [Dkt. No. 11014] and the *Reorganized Debtors' Thirteenth Securities Claims Omnibus Objection (Claims Barred by the Statute of Repose)* [Dkt. No. 11085] continue to be sustained as to claims held by the DRRT Claimants arising under Section 11 of the Securities Act of 1933.

1 4. This Order is without prejudice to the rights of the Reorganized Debtors to object to the
2 proofs of claim filed by the DRRT Claimants on any other grounds.

3 5. This Court shall retain jurisdiction to resolve any disputes or controversies arising from
4 this Order.

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6 **APPROVED AS TO FORM AND CONTENT:**

7 Dated: April 4, 2022

8 **MEYER LAW GROUP LLP**

9 /s/ Brent D. Meyer

Brent D. Meyer

10 *Attorney for DRRT Claimants*

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12 *** END OF ORDER ***
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